

Joseph & Norinsberg LLC

Fighting for Employee Justice



Queens Office
69-06 Grand Avenue, 3rd Floor
Maspeth, New York 11378

Manhattan Office
110 East 59th Street, Suite 2300
New York, New York 10022

Newark Office
One Gateway Center, Suite 2600
Newark, New Jersey 07102

Philadelphia Office
1515 Market Street, Suite 1200
Philadelphia, Pennsylvania 19102

Boston Office
225 Franklin Street, 26th Floor
Boston, Massachusetts 02110

Orlando Office
300 N. New York Ave, Suite 832
Winter Park, Florida 32790

Arjeta Albani, Esq.
arjeta@employeejustice.com

January 27, 2025

VIA ECF

Hon. Vernon S. Broderick
United States District Court Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 518
New York, New York 10007

Re: Robles v. Green Sun Inc. d/b/a Hibernica
Case No. 1:24-cv-7660-VSB

Dear Judge Broderick:

We represent Plaintiff Primitivo Robles ("Plaintiff") in the above-referenced ADA matter. With the consent of the Defendant, and pursuant to the Court's Order dated January 15, 2025 (Dkt. No. 13), which mandates the finalization of default proceedings by January 29, 2025, to avoid dismissal, we respectfully inform the Court that the parties have reached a settlement in principle in this action. The parties are currently in the process of preparing the necessary settlement documentation.

In light of the anticipated settlement, the parties respectfully request that all currently pending deadlines and conferences in this action, if any, be adjourned sine die.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

JOSEPH & NORINSBERG, LLC

Arjeta Albani, Esq.
Attorneys For Plaintiff

110 East 59th Street, Suite 2300
New York, New York 10022
(212) 227-5700
Fax No. (212) 656-1889
arjeta@employeejustice.com

c.c.
Andy Sick, Esq.
Andy.sick@sicklegal.com